

August 15, 2002

Lawrence Clance  
Federal Communications Commission  
Enforcement Bureau  
Technical and Public Safety Division  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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Federal Communications Commission  
Office of Secretary

**Re: Centennial Puerto Rico Operations Corp./Centennial  
Puerto Rico License Corp.  
File No. EB-02-TS-344**

Dear Mr. Clance:

This letter responds to the referenced letter of inquiry, dated July 30, 2002 ("July 30 Letter"), which was sent to Luis Carpena, the Director of Wireline Engineering and Planning Department of Centennial Puerto Rico Operations Corp. ("Centennial Operations Corp."). The purpose of the Commission's July 30 Letter was to inquire as to whether Centennial is in compliance with the Commission's Enhanced 911 ("E911") Phase II rules. As demonstrated below, please be assured that Centennial has been and remains in full compliance with the FCC's E911 Phase II rules and current orders.<sup>1</sup>

The July 30 Letter correctly notes that Centennial selected a handset-based location solution for Phase II E911 compliance in its November 9, 2000 Report to the Commission.<sup>2</sup> However, the July 30 Letter also states that the Commission's records indicate that Centennial License Corp. did not file a request for relief from the E911 Phase II rules, and because of this, the Wireless Telecommunications Bureau asked the Enforcement Bureau to investigate whether Centennial is in compliance with the E911 Phase II rules. While the Commission is correct that Centennial did not file an E911 Phase II waiver request for our Puerto Rico market, the Commission is not aware of all relevant filings that Centennial has made. As explained below, on September 26, 2001, Centennial made another filing with the Commission to ensure that it would not be in violation of the E911 Phase II requirements.

<sup>1</sup> See 47 C.F.R. § 20.18(f)-(g); *Order To Stay* in CC Docket No. 94-102, Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, FCC 02-210, released July 26, 2002 ("Stay Order").

<sup>2</sup> As explained in the September 26, 2001 filing, the November 9, 2000 Report was submitted erroneously under the name Centennial Puerto Rico Operations Corp. ("Centennial Operations Corp.") Centennial Operations Corp. is a subsidiary of Centennial Communications Corp. and is involved in the operation of our Puerto Rico market. However, Centennial Puerto Rico License Corp. ("Centennial") is the Centennial subsidiary that holds the B block broadband PCS license for the Puerto Rico/United States Virgin Islands MTA (MTA 25), and the name in which the original November 9, 2000 Report should have been submitted.

On September 26, 2001, Centennial Puerto Rico License Corp. electronically filed with the FCC an "Amended Report on E911 Deployment Requirements" ("September 26 Report").<sup>3</sup> In the September 26 Report, Centennial advised the Commission that we had recently decided to switch our E911 Phase II solution for the Puerto Rico market from a handset-based solution to a network-based solution. We cited a variety of reasons for this change, including the lack of availability of CDMA-compatible, ALI capable handsets, significant cost savings, and the belief that a network-based solution would be available to Centennial for deployment in our Puerto Rico market earlier than a handset-based solution.<sup>4</sup> In addition, Centennial advised the Commission that as of the date of its Report, we had not received a valid PSAP request (or indeed *any* request) from the sole PSAP on the island of Puerto Rico for E911 Phase II service.<sup>5</sup> Finally, Centennial affirmed its commitment to timely comply with our Phase II obligations within six months of receiving a valid PSAP request.<sup>6</sup> Consequently, based on our filing of the September 26 Report,<sup>7</sup> Centennial believes that it has at all times remained in compliance with the FCC's E911 Phase II requirements.

Based on the information provided above, Centennial provides the following limited response to the questions put forth in your July 30 Letter.

**In response to items (1) and (2)** – Centennial advises the Commission that it did not offer ALI-capable handsets to its customers by October 1, 2001, and is not presently doing so. As explained above, this October 1, 2001 requirement did not apply to Centennial, as we had amended our E911 Phase II solution prior to last October 1.

**In response to items (3) through (5)** – Centennial advises the Commission that as of August 15, 2002, it has yet to receive a request for Phase I or II E911 service from the sole PSAP that serves the island of Puerto Rico. However, we also note that we have been in regular contact with the PSAP, and we are aware that the PSAP has begun the planning and implementation process for both Phase I and Phase II E911 service. At this point, the PSAP expects to be submitting their request for Phase I/II E911 service to us in early 2003. In addition, Centennial has been invited, and we plan to attend, a PSAP Request for Proposals planning meeting scheduled for August 19, 2002. By attending these planning meetings, we hope to be able to coordinate our E911 Phase II implementation process with the PSAP's own process.

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<sup>3</sup> A copy of this Report, as obtained from the FCC's ECFS system, is attached.

<sup>4</sup> See September 26 Report at pp. 1-2.

<sup>5</sup> *Id.* at p. 2.

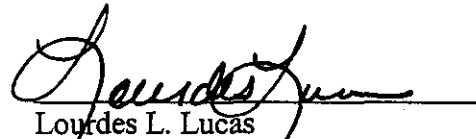
<sup>6</sup> *Id.*

<sup>7</sup> Centennial notes that both before and after the former October 1, 2001 E911 Phase II implementation deadline, numerous CMRS carriers notified the FCC that they were changing their previously identified Phase II implementation solution. See, e.g., Updated Phase II E911 Report and Request for Limited Waiver of Verizon Wireless, dated July 25, 2001; Updated Phase II E-911 Report and Request for Limited Waiver of MP Communications Partners, L.P., dated February 11, 2002; Amended Petition for Temporary Waiver of the E911 Phase II Enhanced Wireless Services, dated April 18, 2002.

In summary, Centennial submits that it has been in compliance with the FCC's E911 Phase II requirements since the implementation of those regulations. We believe that this position is supported by the fact that we notified the Commission that we were changing our E911 Phase II compliance approach prior to the October 1, 2001 deadline, and by the fact that to date, we have yet to receive a request for either Phase I or II E911 service from the sole PSAP in Puerto Rico. If you have any questions regarding this response, or would like additional information, please do not hesitate to contact me, or our regulatory counsel for this issue, Terry Cavanaugh at Cole, Raywid & Braverman, LLP (202-828-9857).

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief:

Sincerely,

  
Lourdes L. Lucas  
Vice President, Legal Affairs  
Centennial Communications Corp.

cc: Blaise Scinto

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
<b>Revision of the Commission's Rules to</b>	)	<b>CC Docket 94-102</b>
<b>Ensure Compatibility with Enhanced 911</b>	)	
<b>Emergency Calling Systems</b>	)	
 <b>To: Chief, Wireless Telecommunications Bureau</b>		

**CENTENNIAL COMMUNICATIONS CORP.  
AMENDED REPORT ON E911 DEPLOYMENT REQUIREMENTS**

Centennial Communications Corp. ("Centennial"), by its attorneys and pursuant to Section 20.18(i) of the FCC's rules, and the *Fourth Memorandum Opinion and Order*<sup>1</sup> in this proceeding, hereby amends the Phase II E911 Implementation Plan submitted on November 9, 2000 ("November 9 Report") by its subsidiary Centennial Puerto Rico License Corp. ("Centennial License Corp.")<sup>2</sup>. This amendment reflects a recent change in the Phase II E911 technology that Centennial now intends to deploy in its Caribbean markets.

In the November 9 report, Centennial advised the Commission that it intended to deploy the FINDS Position Determination Equipment hybrid solution being developed by Lucent Technologies. However, Centennial recently decided to switch from the Lucent hybrid solution

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<sup>1</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Fourth Memorandum Opinion and Order, 15 FCC Rcd. 17442 (2000) ("*Fourth MO&O*").

<sup>2</sup> The November 9 Report was submitted erroneously under the name Centennial Puerto Rico Operations Corp. (Centennial Operations Corp.) Centennial Operations Corp. is also a subsidiary of Centennial and is also involved in the operation of Centennial's Puerto Rico market. However, Centennial License Corp. is the Centennial subsidiary that holds the B block broadband PCS license for the Puerto Rico/United States Virgin Islands MTA (MTA 25), and the name in which the original report should have been submitted.

to a network based solution offered by TruePosition, Inc. The decision to change Phase II E911 technologies was based primarily on economic factors, with Centennial being able to realize a significant cost savings by switching to a network based solution. In addition, since none of Centennial's handset vendors have yet made ALI-capable handsets available, which are also compatible with Centennial's CDMA network, switching Phase II solutions for purely economic reasons is justified. Furthermore, while Centennial has not yet been given definitive General Availability ("GA") dates by TruePosition, it is Centennial's understanding that TruePosition's network based solution is further along in development than many other solutions, and presumably, will be deployed sooner.

Centennial presently is in the process of conducting a trial and field testing of the TruePosition network solution in the San Juan metro area. Clearly, this testing will comply with the Empirical Testing Method outlined in the FCC's OET Bulletin No. 71. The remainder of the information submitted by Centennial in the November 9 Report remains accurate. In particular, to date, Centennial still has not received a PSAP request for Phase II implementation pursuant to Section 20.18(j) of the Commission's rules. Indeed, the single PSAP in the Puerto Rico market has indicated to Centennial that it has not yet focused on the Phase II E911 implementation issue. Consequently, Centennial is still unable to comment on PSAP interface issues.

Since Centennial License Corp is now deploying a network based solution in its Puerto Rico market, it is in compliance with Section 20.18 (f) of the rules. Centennial remains fully committed to timely complying with its Phase II obligations within six months of receiving a valid PSAP request, and with the changes outlined above, Centennial anticipates that it will be able to do so.

Centennial will continue to keep the Commission apprised of any significant developments that occur regarding its Phase II implementation in its Caribbean market.

Respectfully submitted,  
**Centennial Communications Corp.**

By: /s/ Theresa Z. Cavanaugh  
Theresa Zeterberg Cavanaugh  
**COLE, RAYWID & BRAVERMAN, LLP**  
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Second Floor  
Washington, DC 20006  
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September 26, 2001